



Position Paper on EASA's Opinion 1/2018

March 2018

The Confederation of European Security Services (CoESS) welcomes the EASA's Proposal to create common rules for operating drones in Europe, and for its Opinion 1/2018 published on 8 February 2018.

CoESS has commented on several occasions on EASA documents and wishes to reiterate its interest for UAs, as useful addition to the range of technological means and equipment in use in private security services. As also highlighted in previous position papers, CoESS sees opportunities in **three types of activities** with unmanned aircraft:

- **Supporting guards in their missions**, making them less dangerous and more efficient, using fully automated drones to carry out security missions;
- **Tracking, tracing, monitoring and responding to alerts related to drones**, in the same way as the industry already tracks land vehicles, in coordination and cooperation with air control agencies;
- **Detecting and preventing the ill use of UA's**, whether unintentional, intentional or malicious - subject to rules and regulations creating a legal basis for this type of response and the ensuing liability as a result of the latter.

Further to the meeting of the EU Drones Expert Group held on 9 March, CoESS wishes to confirm the following:

- Although CoESS welcomes the fact that security is now mentioned in the document, it still has concerns that it is not sufficiently taken into account. In its position paper dated September 2017, CoESS highlights the need to carry out a full risk assessment on the regulation on drones, based on a list of **reports from specialised and credible organisations regarding attacks and illegal activities currently carried out with UAs in Europe and in the Middle East**.
- CoESS understands the urge of the Commission to move on with the legislation in order to grasp all the commercial opportunities that UAs offer, and at the same time fears that if the security side is not sufficiently taken into account, **a single security incident may jeopardise the future of drones and compromise the citizens' trust in UAs**.
- EASA mentioned that **security risk assessments** had been made but there was no precise

Catherine PIANA, Director General

CoESS | Confederation of European Security Services
Jan Bogemansstraat | rue Jan Bogemans 249 | B-1780 Wemmel Belgium
Mobile : +32 472 180 107 | catherine@coess.eu | coess.org

information regarding who performed them and how. Furthermore, risk assessments made today may not be taking into account the very fast progress made with miniaturisation, speed, flight duration and other technical features, for the better and the worse. Risk assessments need to be dynamic processes, and therefore it should also be foreseen that they be repeated at regular intervals and that the rules be re-evaluated from a security perspective, and counterbalanced with the mitigation processes and technologies available.

- CoESS also has concerns on **cybersecurity and IoT security**. In particular, it wonders if there is sufficient security embedded both in the hardware and software or if manufacturers and developers need to step up current security measures and technologies.
- Regarding very small UAs, below 250g MTOM, whilst they may look harmless today, how can one be sure that it will remain so? CoESS draws the attention of EASA to the simulations made regarding **autonomous weapons** and featured in the movies to be found in the following websites: www.stratogenergetics.com and www.autonomousweapons.org. Whilst these may be fictional, they refer to existing technology.
- With respect to the specific category, whilst the opinion mentions a **security risk assessment** that has to be made, there is no **methodology** for this at the present time, and CoESS understands that Member States have not yet given feedback on how these are made and who is entitled to make them. (Annex Subpart B UAS.SPEC.020 section 2 (g))

Standard Scenarios

CoESS issued a position paper in March 2017 entitled “**The Use of UA in Private Security**”, which includes a number of standard scenarios for the use of UAs in the industry it represents. It would welcome some feedback on these scenarios and **request to take part in the EASA Workshops** organised by EASA in July 2018 to examine standard scenarios.

Catherine PIANA
Director General

CoESS acts as the voice of the private security industry, covering 23 countries in Europe, of which 19 in the EU, representing around 2 million licensed guards, over 42,000 companies and generating a turnover of €42M+. The private security services provide a wide range of services, both for private and public clients, ranging from Ministry/EU Institutions buildings to nuclear plants, airports, critical infrastructure facilities, inter-modal transport hubs, public transport stations and areas, national governmental agencies and institutions (such as asylum seekers centres, public hospitals, universities, etc.).

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